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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LERMA, *et al.*,
[#1 MICHAEL LERMA]
[#6 CARLOS GONZALEZ]
[#7 JUAN SANCHEZ]
[#8 JOSE GONZALEZ]

Defendants.

No. 2:18-CR-00172(A)-GW-1, 6, 7, 8

GOVERNMENT'S EX PARTE APPLICATION
FOR LEAVE TO FILE OVERSIZE BRIEF;
DECLARATION OF KELLYE NG

Plaintiff United States of America, by and through its counsel of record, the First Assistant United States Attorney for the Central District of California and Assistant United States Attorneys Kellye Ng, Kyle W. Kahan, and Jason A. Gorn, hereby applies ex parte for an order granting the government to file an oversized brief with respect to its omnibus opposition to defendants' motions for judgments of acquittal and motions for new trial (Dkts. 1799, 1800, 1802, 1803, 1804, 1805, 1807, 1808, 1809). The government seeks to file an

1 approximately 11,420-word opposition in response to the four
2 defendants' motions, which is approximately 4,420 words longer than
3 the Local Rule's 7,000 word limit.

4 This ex parte application is based upon the attached declaration
5 of Kellye Ng.

6 Dated: November 3, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
8 First Assistant United States
Attorney

9 ALEXANDER B. SCHWAB
10 Assistant United States Attorney
Acting Chief, Criminal Division

11
12 /s/
KELLYE NG
13 KYLE W. KAHAN
JASON A. GORN
14 Assistant United States Attorneys

15 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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DECLARATION OF KELLYE NG

I, Kellye Ng, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. The government requests leave to file an oversized motion with respect to its omnibus opposition to defendants' motions for judgments of acquittal and motions for new trial ("omnibus opposition"). The government seeks to file an approximately 11,420-word opposition, which is approximately 4,420 words longer than the Local Rule's 7,000-word limit.

3. After a 20-day jury trial, defendants Mike Lerma, Carlos Gonzalez, Juan Sanchez, and Jose Valencia Gonzalez filed motions for judgments of acquittal and motions for a new trial. (Dkts. 1799, 1800, 1802, 1803, 1804, 1805, 1807, 1808, 1809.)

4. I am aware of Local Rule 11-6.1, which limits post-trial briefs at 7,000 words. I am also aware of the Court's busy docket and its desire to not waste time reading unnecessarily long briefs. But given the four defendants' post-trial motions, exceeding the page limit for the government's omnibus opposition is practically necessary for the Court to properly analyze and consider Rules 29 and 33.

5. On November 3, 2025, I emailed defendants' counsel about the government's request to file an oversized brief.

6. For these reasons, the government respectfully requests leave to file an oversized brief with respect to its omnibus opposition.

1 I declare under penalty of perjury under the laws of the United
2 States of America that the foregoing is true and correct and that
3 this declaration is executed at Los Angeles, California, on November
4 3, 2025.



KELLYE NG
Declarant